

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

21 MC 103

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RAMON ZAMBRANA,

08CV02320

Plaintiffs,

- against -

ON-SITE:

7 WORLD TRADE COMPANY, L.P.; A RUSSO WRECKING, INC.; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST, INC.; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE SPECIALIZED HAULING LLC; ATLANTIC HEYDT CORP.; BECHTEL ASSOCIATES PROFESSIONAL CORPORATION; BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL, INC.; BERKEL & COMPANY, CONTRACTORS, INC.; BIG APPLE WRECKING & CONSTRUCTION CORP; BOVIS LEND LEASE LMB, INC.; BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER-FOUR TRANSPORTATION CORP.; BURO HAPPOLD CONSULTING ENGINEERS, P.C.; C.B. CONTRACTING CORP; CANRON CONSTRUCTION CORP.; CORD CONTRACTING CO., INC.; DAKOTA DEMO-TECH ; DIAMOND POINT EXCAVATING CORP; DIEGO CONSTRUCTION, INC.; DIVERSIFIED CARTING, INC.; DMT ENTERPRISE, INC. D'ONOFRIO GENERAL CONTRACTORS CORP.; EAGLE LEASING & INDUSTRIAL SUPPLY, INC.; EAGLE ONE ROOFING CONTRACTORS INC; EJ DAVIES, INC.; EN-TECH CORP.; EVERGREEN RECYCLING OF CORONA(EROC); EWELL W. FINLEY, P.C; EXECUTIVE MEDICAL SERVICES, P.C; FLEET TRUCKING, INC.; FRANCIS A. LEE EXTERIOR RESTORATION, INC.; FTI TRUCKING, INC.; GILSANZ, MURRAY, & STEFICEK, LLP, GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC; HALLEN WELDING SERVICE, INC.; H.P. ENVIRONMENTAL; KOCH SKANSKA INC; LAQUILA CONSTRUCTION INC.; LASTRADA GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEERS P.C; LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC.; LZA TECH-DIV OF THORTON TOMASETTI; MANAFORT BROTHERS INCORPORATED; MAZZOCCHI WRECKING, INC.; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH AMERICAN CORP.; MRA ENGINEERING, PC; MUESER RUTLEDGE CONSULTING ENGINEERS, INC; NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.; NICHOLSON CONSTRUCTION COMPANY; PETER SCALAMANDRE & SONS, INC.; PINNACLE ENVIRONMENTAL CORP.; PLAZA CONSTRUCTION CORP.; PRO SAFETY SERVICES LLC; PT & L CONTRACTING CORP.; ROBER SILMAN

ASSOCIATES; ROBERT L. GEROSA, INC.; RODAR ENTERPRISES, INC.; ROYAL GM, INC; SAB TRUCKING INC; SAFEWAY ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL CONTRACTING; SEMCOR EQUIPMENT & MANUFACTURING CORP.; SILVERITE CONTRACTING CORPORATION; SIMPSON GUMPERTZ & HEGER INC.; SKIDMORE, OWING & MERRILL LLP; SURVIVAIR; TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION CORPORATION OF NEW YORK; TISHMAN INTERIORS CORPORATION; TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI GROUP, INC; TORRETTA TRUCKING, INC; TOTAL SAFETY CONSULTING, L.L.C; TUCCI EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION CO., INC; TURNER CONSTRUCTION COMPANY; ULTIMATE DEMOLITION/CS HAULING (JOINT VENTURE); VOLLMER ASSOCIATES LLP.; WEEKS MARINE, INC.; WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C; WHITNEY CONTRACTING INC.; WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE CENTER PROPERTIES LLC; WSP CANTOR SEINUK; YANNUZZI & SONS, INC; YONKERS CONTRACTING COMPANY, INC; YORK HUNTER CONSTRUCTION, LLC; ZIEGENFUSS DRILLING, INC.,

OFF-SITE:

100 CHURCH, LLC, ALAN KASMAN DBA KASCO, AMBIENT GROUP, INC., AMERICAN EXPRESS BANK, LTD, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC, ANN TAYLOR STORES CORPORATION, BANKERS TRUST COMPANY, BATTERY PARK CITY AUTHORITY, BFP TOWER C CO. LLC, BFP TOWER C MM LLC, BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC D/B/A BMS CAT, BROOKFIELD FINANCIAL PROPERTIES, INC, BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC, BT PRIVATE CLIENTS CORP., CUNNINGHAM DUCT CLEANING CO., INC, DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, ENVIROTECH CLEAN AIR, INC., GPS ENVIRONMENTAL CONSULTANTS, INC., HILLMAN ENVIRONMENTAL GROUP, LLC, INDOOR ENVIRONMENTAL TECHNOLOGY, INC, KASCO RESTORATION SERVICES CO., LAW ENGINEERING P.C, LEHMAN BROTHERS HOLDINGS INC., LEHMAN BROTHERS, INC., LEHMAN COMMERCIAL PAPER, INC, MERRILL LYNCH & CO, INC., NOMURAHOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ROYAL AND SUNALLIANCE INSURANCE GROUP, PLC, STRUCTURE TONE (UK), INC, STRUCTURE TONE GLOBAL SERVICES, INC, THE BANK OF NEW YORK TRUST COMPANY NA, TISHMAN INTERIORS CORPORATION, TOSCORPINC, TRAMMELL CROW COMPANY, TRAMMELL CROW CORPORATE SERVICES, INC., TRC ENGINEERS, INC, TUCKER ANTHONY, INC., TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES, INC,

VERIZON NEW YORK, INC, WESTON SOLUTIONS, INC., WFP RETAIL CO. G.P. CORP., WFP RETAILCO. L.P., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A CO., LP., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., AND ZAR REALTY MANAGEMENT CORP., ET AL

Defendants

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**ENVIROTECH CLEAN AIR'S ANSWER TO CHECK OFF COMPLAINTS  
RELATED TO THE MASTER COMPLAINTS**

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off Complaint") related to the Master Complaints filed in the 21 MC 100 and 21 MC 102 actions, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York  
June 6, 2008

Yours, etc.

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FRIEDMAN, HARFENIST, LANGER & KRAUT  
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BY:   
Heather L. Smar (4622)